

Delena Pool
Arbonne International

July 17, 2006

Dear Sir:

I am writing this letter because I am concerned about the proposed Business opportunity Rule R511993. I believe this ruling could prevent me from continuing as an Arbonne Independent Consultant. I know that part of the FTC's responsibility is to protect the public from unfair acts, but some areas of the proposed rule will make it extremely difficult for me to sell Arbonne products and get other people into my business.

One of the most restrictive sections of the proposed rule is the 7-day waiting period to sign up new consultants. Not only do Arbonne Started Kits cost a nominal amount of money, the waiting period gives the impression that there might be something wrong with the Arbonne opportunity. Under this waiting period requirement, I would need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. I feel it is key in my business to catch someone's excitement about Arbonne's products immediately; the waiting period would potentially limit my ability to grow my business.

The proposed rule also calls for the release of any information regarding lawsuits involving unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission to strangers. Also, sharing this information could damage the business relationship of references with those involved in other companies or business, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne office in California and then wait for the list. I would find it an invasion of privacy to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for more than 31/2 years. I became a Consultant because I love the products and our family was in need of a second income to provide for our family of 5. Since starting my Arbonne business, I have developed a

team of 1,500 Independent Consultants across the country and together we are helping our families enjoy better lives.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,

Delena Pool